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15 Attorneys for PLAINTIFF
ROBERT HUNTER BIDEN

16 **UNITED STATES DISTRICT COURT**
17 **CENTRAL DISTRICT OF CALIFORNIA**
18 **WESTERN DIVISION**

19 ROBERT HUNTER BIDEN, an
20 individual,

21 Plaintiff,

22 vs.

23 PATRICK M. BYRNE, an individual,
24 Defendant.

Case No. 2:23-cv-09430-SVW-PD

**PLAINTIFF ROBERT HUNTER
BIDEN'S REQUEST FOR
COUNSEL TO APPEAR
REMOTELY FOR JANUARY 27,
2025 STATUS CONFERENCE;
DECLARATION OF ABBE D.
LOWELL**

*[[Proposed] Order filed and served
concurrently herewith]*

Date: January 27, 2025
Time: 3:00 p.m.
Ctrm.: 10A

Judge: Hon. Stephen V. Wilson

5800299.2

**PLAINTIFF ROBERT HUNTER BIDEN'S REQUEST FOR COUNSEL TO APPEAR REMOTELY FOR
JANUARY 27, 2025 STATUS CONFERENCE; DECLARATION OF ABBE D. LOWELL**

TO THE HONORABLE COURT, ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

Plaintiff Robert Hunter Biden (“Plaintiff”) hereby respectfully requests permission from this Court for his Counsel, Abbe D. Lowell, to appear remotely by way of videoconference (e.g. Zoom) for the Status Conference scheduled in this case for January 27, 2025 at 3:00 p.m. Plaintiff understands the Court’s standing order requires a request to appear remotely for a proceeding to be filed seven (7) days prior to the hearing, but here, because the Status Conference was scheduled for less than seven (7) days from the Court’s Minute Order scheduling that conference (Dkt. No. 178), Plaintiff filed this request as soon as possible and respectfully requests the Court grants this request.

Good cause exists to grant this request because Mr. Lowell has been involved in the disposition of the current discovery dispute that formed the basis of Plaintiff’s January 14, 2025 *Ex Parte* Application, Mr. Lowell was the person who took Defendant’s first deposition, and he has also been the direct subject of some of Defendant’s recent allegations and his participation in the status conference is, therefore, necessary. (*See* Declaration of Abbe D. Lowell, at ¶2.) Mr. Lowell is unable to be in the State of California on January 27, 2025, due to prior commitments (he teaches a large class at Georgetown Law Center in Washington, D.C. on Mondays), but Mr. Lowell’s co-counsel, Bryan M. Sullivan, will be appearing in person for the Status Conference, so Plaintiff will have another attorney present for this hearing. (*See* Declaration of Abbe D. Lowell, at ¶3.)

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1 Accordingly, Plaintiff respectfully requests that the Court grant this request for
2 Mr. Lowell to appear remotely by videoconference at the January 27, 2025 Status
3 Conference in this matter.

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5 Dated: January 23, 2025

EARLY SULLIVAN WRIGHT
GIZER & MCRAE LLP

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8 By: /s/ Zachary C. Hansen

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26 *Attorney for Plaintiff*
Robert Hunter Biden
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DECLARATION OF ABBE D. LOWELL

I, Abbe D. Lowell, declare and state as follows:

1. I am counsel of record for Plaintiff Robert Hunter Biden (“Plaintiff”) in the above-entitled action and am over the age of 18. I hereby submit this declaration in support of Plaintiff’s Request for Counsel to Appear Remotely for January 27, 2025 Status Conference. If called as a witness, I would and could testify to the matters contained herein.

2. I have involved in the disposition of the current discovery dispute that formed the basis of Plaintiff’s January 14, 2025 *Ex Parte* Application, I was the person who took Defendant’s first deposition, and I have also been the direct subject of some of Defendant’s recent allegations and my participation in the status conference is, therefore, necessary.

3. I am unable to be in the State of California on January 27, 2025, due to prior commitments (I teach a large class at Georgetown Law Center in Washington, D.C. on Mondays), but my co-counsel, Bryan M. Sullivan, will be appearing in person for the Status Conference, so Plaintiff will have another attorney present for this hearing.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on this 23rd day of January, 2025, at Washington, D.C.

/s/ Abbe D. Lowell

Abbe D. Lowell